

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA,)
)
v.)
)
CHARLES NATHANIEL WILLIAMS)
)

Case No. 4:16CR00004

MOTION FOR REVIEW OF DETENTION ORDER
AND FOR RELEASE ON BOND

Defendant, by counsel, pursuant to 18 USC § 3145(b) moves for review of the Magistrate Judge's detention order and for release on bond and in support thereof states:

1. Defendant stands charged by way of an indictment returned on April 15, 2016 with seven counts of distribution of cocaine, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C); three counts of possession of a firearm as a convicted felon, in violation of 18 U.S.C. § 922(g)(1); and one count of possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c).
2. On April 20, 2016, the Magistrate Judge ordered that Mr. Williams be detained pending trial, which is scheduled for trial on June 16, 2016. The Magistrate Judge found that Mr. Williams's release plan (that he reside with his wife, who would serve as third party custodian) was inadequate.
3. On May 2, 2016, the Defendant moved for review of the bond hearing and for an opportunity to present an alternative home plan (to live with his mother- and father-in-law, along with his family). The Magistrate Judge again denied Mr. Williams's motion for bond. Mr. Williams seeks review of that determination and the opportunity for his mother-in-law to testify and convince the court of the adequacy of the release plan. He submits that there are conditions of release that will ensure his presence in court and protect the community and asks for the opportunity to so convince the court.

Wherefore, defendant respectfully requests that the court grant his request for a hearing before the District Court on this motion and set terms of his release pending his trial.

Respectfully submitted,

CHARLES NATHANIEL WILLIAMS

By: /s/ Allegra M.C. Black
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2016, I served the foregoing Motion for Review of Detention Order upon Ashley Neese, Assistant United States Attorney, by electronic filing and I caused the original thereof to be filed electronically with Julia Dudley, Clerk, United States District Court, 210 Franklin Road, S.W. Roanoke, VA 24011.

By: /s/Allegra M.C. Black
Allegra M.C. Black